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May 25, 2022

VIA ECF

Honorable Stephanos Bibas
U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: *Elmagin Capital, LLC v. Chen et al*, No.: 2:20-cv-02576-SB (E.D. Pa.)
Request for One Day Extension of Briefing Deadline

Dear Judge Bibas:

We write to respectfully request a brief extension of Defendants' deadline to respond to Plaintiff's Request for Reconsideration of the Court's Denial of Plaintiff's JMOL to Reverse the Verdicts Finding Bad Faith of Plaintiff and Absence of Breach of the NDNC [Dkt. 290]. The undersigned Counsel for Defendants has been traveling on another matter this week and has encountered unexpected difficulties working remotely on Defendants' Opposition Brief. Accordingly, Defendants respectfully request a one-day extension of their deadline from tomorrow, May 26, 2022 to and including May 27, 2022.

Counsel advised Plaintiff of this request this afternoon but as yet has not received a response as to Plaintiff's position on it. Since the deadline is tomorrow, Defendants did not wish to delay further in bringing this request to the Court's attention.

Respectfully,

cc: All Counsel of Record via ECF